



April 5, 2017

Document Processing Desk 6(a)(2)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: 6(a)(2) Study Report Submission – Phenmedipham Technical (EPA Registration # 264-618) – Ecotoxicology Study Report

Dear Sir/Madam,

Bayer is submitting new information to EPA related to Phenmedipham Technical (EPA Registration # 264-618) as required by conditions set forth in 40 CFR § 159.165(b)(1). This information is not necessarily a new adverse effect of the subject chemical, but is rather new information submitted for EPA's own review and evaluation because the data meet EPA's administrative reporting criteria.

This Study Report is entitled "Toxicity of Phenmedipham Tech. (BCS-AD17874) to the Aquatic Plant *Myriophyllum Spicatum* in a Semi-Static Growth Inhibition Test." The previously submitted myriophyllum study has a non-definitive EC50. This study has a definitive EC50. However, in the context of the risk assessment, no significant change will be observed.

This information is being submitted to the EPA pursuant to EPA's interpretation of requirements imposed on registrants by Section 6(a)(2) of FIFRA.

The content of this 6(a)(2) study report is also related to the Phenmedipham Registration Review DCI (ID # GDCI-098701-1531). Therefore, please share it with Miguel Zavala, Chemical Review Manager.

Should EPA have questions, please feel free to contact me at any time.

Sincerely,

A handwritten signature in cursive script that reads "Sundee K. Williams".

Sundee Williams
AE Compliance Manager
Crop Science
A Division Of Bayer
North American Knowledge & Information Management
(919)549-2255

Crop Science
A Division Of Bayer
2 T. W. Alexander Drive
Research Triangle Park, NC 27709



M-584628-01-1

DOCUMENTUM

CC:

Ann Hanger, CA Department of Pesticide Regulation

Jeanine Broughel, NY Department of Environmental Conservation

**TRANSMITTAL DOCUMENT****264-618 Phenmedipham Technical****CP-6(a)(2)-OPPTS-USA-D-015567****Transmittal Date**

April 05, 2017

Company Official:

A handwritten signature in black ink that reads "Amy J. McCaskill".

Company Name:

Bayer CropScience LP

Company Contact:

McCaskill, Amy

Company Telephone:

+1 919-549-2297

Bayer CropScience LP
2 T.W. Alexander Drive
Research Triangle Park
NC 27709 Durham
United States of America

DOCUMENTUM**M-584444-01-1**

BIBLIOGRAPHY OF SUBMITTED DATA

Study No.	Study	Guideline No.	EPA MRID No.
	RPT Study Reports		
	850 Ecological Effects Test Guidelines		
	Group A Aquatic & Sediment-Dwelling Fauna, Aquatic Microcosm & Field Testing Guidelines		
1	Kuhl, K.; Toxicity of phenmedipham tech. (BCS-AD17874) to the aquatic plant <i>Myriophyllum spicatum</i> in a semi-static growth inhibition test; Bayer AG, Crop Science Division, Monheim, Germany; Report No.: EBPH0002; Document No.: M-580251-01-1; 2017-02-01; Pages: 124	850.1010	50227501

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